

FCC MAIL BRANCH

JUN 8 1992

ORIGINAL
FILE

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the matter of)
Amendment of Section 73.202(b))
Table of FM Allotments)
Mammoth Lakes, California)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION FOR RULEMAKING

Comes now, Mammoth Mountain FM Associates, Inc. respectfully requests that the Commission institute rulemaking proceedings for the amendment of Section 73.202(b) of the Commissions rules to amend the FM Table of allotments as follows:

<u>CITY</u>	<u>EXISTING</u>	<u>PROPOSED</u>
Mammoth Lakes, California	292 A	293 B-1

In Support whereof the following is shown:

1. Mammoth Mountain FM Associates, Inc., Licensee of radio station KMMT (FM), seeks to upgrade KMMT (FM) class of operation to B-1 standing from the petitioners current transmitter site to provide Mammoth Lakes and the surrounding areas of Mono County in California with a improved level of service to the public. The petitioner pleads the Commission issue KMMT a new class B-1 allocation and modify KMMT station license consistent with the petitioners request.

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2. The attached engineering report and spacing study shows that the upgrade as proposed using the current transmitter site (37:37:40 N, 119:01:56 W) will conform with current FCC spacing requirements (73.207) and that there are not other petitions or application that conflict with this rulemaking request (see exhibit E-1 attached).

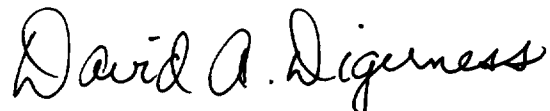
3. The petitioner believes that there would be great public benefit if the commission should grant this upgrade request. KMMT Serves a earthquake prone area and provides the only local broadcast service license to Mammoth Lakes and to all of Mono County. If granted, KMMT will provide a improved level of service to the Mono County towns of June Lake 18 miles, Lee Vining 26 miles and to Bridgeport (Mono county seat) 50 miles to the north all have no local service. KMMT currently has emergency back-up power and is the only local broadcast service in Mono County in place to provide emergency communication to Mono county as the CPCS-1 station. Mammoth Lakes and the surrounding area has had a number of large earthquakes and some volcanic activity just in the past few years. KMMT is the only broadcast service licensed or allocated to the area. KMMT is working closely with local officials to provide emergency communications to the area in the event of an emergency.

4. The petitioner will apply for and construct transmission facilities consistent with this rulemaking request if granted.

In conclusion, Mammoth Mountain FM Associates, Inc. pleads the Commission Allot FM channel 293 B-1 to Mammoth Lakes, California for use by radio station KMMT (FM) from the petitioners current transmitter site and that the Commission, if approving this petition, will modify KMMT's current license consistent with the new channel and power level.

Prepared by:
David Quinlan, consultant
(916) 842-4158

Respectfully submitted:

A handwritten signature in cursive script that reads "David A. Digerness". The signature is written in dark ink and is positioned above the typed name and address.

David A. Digerness, President
Mammoth Mountain FM Associates, Inc.
Post Office Box 1284
Mammoth Lakes, California 93546
(619) 934-2591

EXHIBIT E-1
FM SPACING REPORT AND STUDY
BY DAVID QUINLAN
ENGINEERING CONSULTANT

The attached FM Spacing study by Dataworld (DW, Inc.) was compiled from the FCC database available May 19, 1992 using the coordinates of KMMT's current transmitter site (37-37-40 N 119-01-56 W).

The study shows that three other licensed station are close but do not infringe in to the minimum distances required for this allotment request... KKDJ Fresno 290B is equaled to the minimum distance required 71 km, KWOD Sacramento 293B is 2 km further than the minimum distance required 211 km, and KJUG Tulare 294B is 5 km further than the minimum distance required 145 km.

From the proposed (current) transmitter site KMMT upgrade request complies with the spacing requirements as set in FCC rules 73.207.

Note: distances above are rounded to the nearest kilometer as per FCC rules.

Prepared by:



David Quinlan, Consultant
P.O. Box 125
Yreka, Ca 96097

DAVID QUINLAN
YREKA, CA

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FM Spacing Study

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Job title: KMMT
Channel 293B1
FM Translators excluded.
Coordinates: 37-37-40 119-01-56
Safety zone: 45 km (27 miles)..

FM Spacing study

Title: KMMT
Channel 293B1 (106.5 MHz)
Database: DW 05/18/92

Latitude: 37-37-40
Longitude: 119-01-56
Safety zone: 45 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KJFX	LIC	BROWN BROADCASTING COMPA	239B	17.5	36-56-55	208.1	85.44	17
FRESNO		CA BLH-880616KB	95.7	259	119-29-09	27.8	68.44	CLEAR
Was KYNO-FM 03/30/90 per FCC release #131 dated 04/06/90;								
Affiliated with KYNO(AM)								
KNTD	LIC	DANIEL FORRESTALL	240A	3	37-18-57	257.4	153.5	12
LIVINGSTON		CA BLH-841113KK	95.9	91	120-43-20	76.4	141.5	CLEAR
See DENAIR CA								
KKDJ	LIC	PACIFIC QUADRACASTING	290B	2.40	37-04-23	209.9	70.97	71
FRESNO		CA BLH-791203AF	105.9	597	119-25-51	29.6	.03	
Affiliated with KBBK(AM)								
NEW	APP	CALAVERAS INSPIRATIONAL	291A	1.60	38-13-36	300.1	134.5	48
ARNOLD		CA BPH-911031MB	106.1	191	120-21-43	119.3	86.49	CLEAR
Received per FCC release #15124 dated 11/08/91,								
tendered per 15184 dated 01/31/92, accepted per NA-157 dated 03/12/92								
KMMT	LIC	MAMMOTH MOUNTAIN FM ASSO	292A	.06	37-37-40	.0		96
MAMMOTH LAKES		CA BLH-810122AE	106.3	658	119-01-56	.0	-96	SHORT
KDAY	CP	BENETT KESSLER	292A	3	36-50-00	141.2	112.9	96
INDEPENDENCE		CA BPH-880519MF	106.3	-492	118-14-17	321.7	16.87	CLEAR
Deletion proposed; CP Granted 03/14/91 per FCC release #21077 dated 03/23/91;								
ORDERED TO 223B; Call Granted 05/03/91 per FCC release #157 dated 05/03/91								
KDAT	CP	MERCED COMMUNICATIONS	292A	2.50	37-26-08	260.7	126.2	96
MERCED		CA BPH-911210IH	106.3	151	120-26-23	79.8	30.22	CLEAR
CP Granted 03/31/92 per FCC release #21351 dated 04/06/92; Was KBCY 09/15/89								
KDAT	LIC	MERCED COMMUNICATIONS	292A	2.95	37-25-34	260.2	126.4	96
MERCED		CA BMLH-901119KC	106.3	145	120-26-23	79.3	30.41	CLEAR
License Granted 08/26/91 per FCC release #21197 dated 08/30/91;								
Was KBCY 09/15/89; Ant: Elec. Res. Inc. FML-4								
KWOD	LIC	ROYCE INTERNATIONAL BROA	293B	50	38-38-30	302.7	212.7	211
SACRAMENTO		CA	106.5	94	121-05-25	121.4	1.657	CLOSE
KWOD	CP	ROYCE INTERNATIONAL BROA	293B	50	38-38-30	302.7	212.7	211
SACRAMENTO		CA BPH-830616AA	106.5	125	121-05-25	121.4	1.657	CLOSE
CP Granted 03/29/89								
KEZR	LIC	ALTA BROADCASTING COMPAN	293B	50	37-21-43	263.8	242.7	211
SAN JOSE		CA	106.5	131	121-45-23	82.2	31.71	CLEAR
KJUG-FM	LIC	WESTCOAT BROADCASTING IN	294B	1.20	36-17-08	173.3	150.0	145
TULARE		CA BLH-860930KD	106.7	778	118-50-17	353.5	4.953	CLOSE
Was KJUG 10/23/89; Affiliated with KJUG(AM)								

DAVID QUINLAN
YREKA, CA

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FM Spacing study

Title: KMMT
Channel 293B1 (106.5 MHz)

Latitude: 37-37-40
Longitude: 119-01-56

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KQLB	CP	VLB BROADCASTING, INC.	295A	6	36-55-35	244.6	178.6	48
LOS BANOS		CA BMPH-910913IB	106.9	100	120-50-42	63.5	130.6	CLEAR
CP Granted 01/29/92 per FCC release #21309 dated 02/06/92;								
Call Granted 07/26/91 per FCC release #163 dated 07/26/91								

KAAT	LIC	CALIFORNIA SIERRA CORPOR	296A	.28	37-25-08	249.7	66.26	48
OAKHURST		CA BLH-841123LW	107.1	326	119-44-04	69.2	18.26	CLEAR

>> End of channel 293B1 study <<